

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RYANAIR DAC,

Plaintiff,

v.

BOOKING HOLDINGS INC.,
BOOKING.COM B.V., KAYAK SOFTWARE
CORPORATION, PRICELINE.COM LLC,
and AGODA COMPANY PTE. LTD,

Defendants.

C.A. No. 20-01191-WCB

PARTIES' PROPOSED VOIR DIRE QUESTIONS

General Questions:

1. Is there anyone who because of medical or other important reasons cannot be available for the duration of the trial?
2. Is there anyone who suffers from any condition or situation that would make it difficult to give the parties your full attention and fair consideration if you were selected as a juror?
3. Is there anyone who has difficulty reading, writing or understanding the English language, so that it would impair your ability to understand what you hear in court or to read the documents that may be used as exhibits?
4. Other than what you have heard in the brief description given today of the case, does anyone know or has anyone heard anything about this case?
5. Have you ever purchased products or services from any of the parties in this case?
6. Is there anyone who believes there is something about the kind of case that I described to you that would prevent you from being fair and impartial to all parties in this case?
7. Is there anyone who believes that he or she would be unable to follow the law as I explain it to you, apply that law to the facts that you find in this case, and render the verdict required by the law as I explain it to you?
8. Has anyone on the panel ever sued someone, or been sued by someone? Does anyone on the panel have a close friend or a family member who has been sued, or who has filed a lawsuit? If so, please explain.
9. Has anyone on the panel ever been charged with or convicted of a crime? Has anyone ever had a close friend or family member who has been charged with or convicted of a crime?
10. Has anyone on the panel ever been the victim of a fraud crime? Has anyone ever had a close friend or family member who has been the victim of a fraud crime?
11. Has anyone on this panel ever worked for an airline?
12. Has anyone on this panel ever worked for a travel agent or travel-related company?
13. The evidence in this case may relate, in part, to the following companies and individuals:
 - Ryanair

- Booking.com
- KAYAK
- Etraveli
- Travelfusion
- Navitaire
- Michael O'Leary

Does anyone on the panel have negative views or opinions about any of these entities or individuals? Has anyone had any negative experience with any of these entities or individuals? Please explain.

14. Are you or a family member an Irish citizen or resident?
15. Has anyone on this panel ever worked in the cybersecurity industry?
16. Has anyone on this panel ever worked in a job that involved web scraping?
17. Has anyone on this panel ever worked in public relations?
18. Has anyone on this panel ever worked for an online search or meta search engine?
19. Has anyone on this panel ever been the victim of computer hacking?
20. Has anyone on this panel ever worked in computer programming?
21. Has anyone on this panel ever sent a cease-and-desist letter? Received a cease-and-desist letter?

General Individual Questions:

1. What is your full name and age?
2. What is your city of residence (or area of Wilmington)?
3. What is your marital status?
4. What is the extent of your formal education?
5. Do you have any legal training or experience?

6. What is your present occupation going back 10 years, including name of employer(s), nature of work and title of position(s), and length of time with each employer?
7. What are your major outside interests and hobbies?
8. What newspapers and magazines do you regularly read?
9. What internet websites or blogs do you regularly read or visit?
10. Have you had prior jury service? If so, explain.
11. Have you had prior involvement as a party in any legal proceeding (personally as well as in connection with any employment)?
12. Have you had prior experience as a witness in court or deposition?
13. Have you travelled to Europe in the last five years?
14. Are you or a family member an Irish citizen or resident?

Technology Use and Experience Questions:

1. How comfortable are you using computers, smartphones, and other technologies in your daily life?
2. What type of technology do you use regularly, both at work and at home?
3. Do you use technology primarily for personal, professional, or both purposes? Give examples.
4. Do you follow tech news or trends? If so, what sources do you rely on for this information?
5. When was the last time you purchased a new tech device (e.g., smartphone, tablet) and what influenced your decision?
6. How often do you download or use new software?
7. How often do you download or use new phone applications?
8. Do you regularly use online services like cloud storage, streaming, or social media? If so, which ones?
9. Have you ever experienced data loss or hacking with any online service?
10. How knowledgeable do you consider yourself to be about digital security (e.g., recognizing phishing attempts)?

11. Do you take any steps to protect your digital privacy, such as using VPNs or encryption tools?
12. How do you feel about large tech companies and their impact on society?
13. Do you believe consumers are adequately protected when it comes to technology products and services?

Travel Questions:

1. How often do you travel for leisure or business?
 - a. How do you typically travel? Fly, drive, train?
2. How do you plan your trips?
3. Have you ever booked a Ryanair flight?
 - a. Have you flown on Ryanair?
4. Is anyone on this panel a regular patron of other low cost airlines, for instance, Spirit Airlines, Allegiant Airlines, or Frontier Airlines?
5. Have you ever booked a flight using an online travel agent website like Expedia, Priceline, Booking.com or KAYAK?
 - a. If so, how often do you use online travel agent websites for booking flights?
6. Have you ever booked hotel rooms with an online travel agent website?
 - a. If so, how often do you use online travel agent websites for booking hotel rooms?
7. Have you ever booked a flight using Booking.com or KAYAK?
8. How important is it to have a variety of options available to you when selecting flights?
9. Have you ever had to deal with travel refunds or insurance claims?
10. Has travel become more stressful or complicated in recent years? Why or why not?

Final Qualification Questions:

1. Is there anything else, whether covered or not covered, that would affect your ability to be a fair juror?
2. Is there anything else that you feel is important for the parties in this case to know about you?

Proposed Additional Questions by Ryanair

1. Are you familiar with your rights as a traveler under current regulations?